

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA

v.

PETER RAFAEL DZIBINSKI DEBBINS,  
Defendant.

No. 1:20-CR-193

**MOTION TO SET CIPA SCHEDULE**

Pursuant to the Classified Information Procedures Act (CIPA), 18 U.S.C. App. III §§ 1-16, the United States respectfully moves the Court to establish a schedule for filing deadlines, notices, and hearings pertaining to the use and admissibility of classified information at trial in this matter.<sup>1</sup> As previously ordered on September 4, 2020, at the arraignment hearing in this case, trial by jury has been set to commence on April 5, 2021, at 10:00 a.m.

For the Court's consideration, the parties have agreed to propose the following pretrial CIPA deadlines for this case:

Government's Section 4 filing:	Tues., Dec. 8, 2020
<i>Ex parte</i> Section 4 hearing:	Fri., Dec. 11, 2020
Defendant's Section 5(a) written notice:	Tues., Dec. 15, 2020
Government's response to defendant's Section 5(a):	Wed., Jan. 6, 2021
Defendant's reply:	Mon., Jan. 18, 2021
Section 6(a) hearing:	Mon., Feb. 1, 2021
Section 6(c) hearing:	Fri., Feb. 19, 2021

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<sup>1</sup> On September 4, 2020, the government filed, and the Court entered, an agreed upon Discovery Order governing non-CIPA pretrial discovery.

Any written pleadings pertaining to the Section 6(c) hearing must be filed at least 5 days in advance of the hearing.

In addition, for the Court's consideration, the parties have agreed to propose that pretrial motions unrelated to CIPA be due on Friday, December 11, 2020, responses to such motions be due on Friday, January 8, 2021, replies be due on Friday, January 15, 2021, and a motions hearing be scheduled for Friday, January 22, 2021.

The Government has conferred with the defendant's counsel, who advised that the defense does not oppose this motion.

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of October, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

/s/  
Thomas W. Traxler  
Assistant United States Attorney